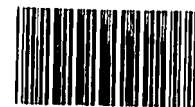




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466



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SS/C IE

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ORIGINATOR'S COPY

Mr. Michael J. Price, Plant Manager
Public Service Company of Colorado Pawnee Power Plant
14940 Morgan County Rd. 24 PO Box 857
Brush, CO 80723

RE: Request for Information Pursuant to
Section 114(a) of the Clean Air Act
Regarding EPA's Coal-fired Power Plant
Investigations

Dear Mr. Price:

The United States Environmental Protection Agency (EPA) hereby requires Public Service Company of Colorado to provide certain information as part of an EPA investigation to determine the Clean Air Act (CAA or the Act) compliance status of your owned and/or operated Pawnee Station, located in Brush, Colorado.

Pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a), the Administrator of EPA is authorized to require any person who owns and/or operates an emission source to establish and maintain records, make reports and provide such other information as he may reasonably require for the purposes of determining whether such person is in violation of any provision of the Act. In order for EPA to determine whether a violation has occurred, you are hereby required, pursuant to Section 114(a) of the CAA, to provide responses to the following questions and requests for information regarding the above identified electric generating station.

EPA has reasons to believe that physical changes or changes in the method of operation may have been made at this power plant. These reasons are, in part, reflected in the enclosed graphs (see Enclosure 3) reflecting operations and expenditures at this plant since 1981. These changes may have resulted in or could in the future result in increased emissions from this plant. Therefore, you are hereby required to respond to the following questions and requests for information within the time periods specified (see Enclosure 1 for instructions and definitions).



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The Capital Appropriation Requests are to include, but not be limited to,

- 1) copies of all Capital Appropriation Requests with authorizing signatures,
- 2) equipment specifications,
- 3) project justifications,
- 4) cost/benefit analyses,
- 5) all alternative options analyses,
- 6) all proposals and price quotations submitted by equipment suppliers or contractors,
- 7) all purchase orders and/or contracts entered into that exceeded \$500,000,
- 8) copies of all correspondence from/to a contractor regarding the material being supplied to support the project that discussed changes in material type or design from the existing component(s) being replaced,
- 9) any engineering or performance test, or related documents, and
- 10) post-completion project and/or equipment guarantee evaluation that was conducted.

Additionally,

- 1) identify the dates when the work orders were completed and the equipment was returned to service,
 - 2) provide all work order project completion reports, and
 - 3) provide copies of any emissions calculations performed before and after the capital project.
4. Provide copies of the original and all subsequent boiler cross-sectional diagrams for each boiler at the station identified above.
 5. Provide original (nameplate) and all subsequent boiler design ratings for each boiler at the station identified above as follows:
 - a. Steam flow rate
 - (1) Peak
 - (2) Sustained,



- (3) PM and PM10,
- (4) Air Toxics (Pb/Hg/HCl/Other).

7. Monthly and annual emissions (lb/mmBTU and tons/year) of the following air pollutants. Emissions information responsive to this request includes annual emissions reports submitted to the applicable state regulatory agency, and all data obtained from any continuous emission monitor (CEM) installed in the flue gas stream. [Specify the timeframes and pollutants, where emissions data has already been reported to the U.S. EPA, (i.e., Acid Rain CEM data/reports, New Source Performance Standards (NSPS) data/reports, etc.). Acid Rain CEM data that has been submitted to the EPA to comply with Title IV requirements and air emissions reports submitted to EPA to comply with applicable NSPS requirements does not have to be resubmitted to satisfy this Section 114 information request letter]:
- (1) NO_x,
 - (2) SO₂,
 - (3) PM and PM10,
 - (4) Air Toxics (Pb/Hg/HCl/Other).
8. For each Coal Fired Boiler Unit at the station identified above, provide copies of all Prevention of Significant Deterioration/New Source Review (PSD/NSR) permit applications submitted to the state regulatory agency with a description of the modifications, and all subsequent correspondence with the state regulatory agency regarding the permit application. Also, provide copies of all PSD/NSR permits that were issued for each Coal Fired Boiler Unit at the station identified above.
9. Provide copies of all correspondence, memoranda, telephone discussion summaries, etc., with either the federal or state regulatory agency regarding PSD/NSR/NSPS applicability determinations for any modifications and/or reconstructions between 1978 and the present for each Coal Fired Boiler Unit at the station identified above.
10. List and provide all life extension/life optimization studies, evaluations, assessments and reports, including any reports and/or correspondence, etc., related to extending the life for each boiler or boiler component at the station identified above.
11. Provide the initial installed cost of each Steam Generating Unit (as defined in Attachment 1) at the station identified above.
12. Identify the total capital expenditures on an annual basis made to each Steam Generating Unit over the life of each unit at the station identified above.



A knowing submittal of false information in response to this request may be actionable under Section 113(c)(2) of the CAA, as well as 18 U.S.C. §§ 1001 and 1341. Public Service Company of Colorado should also be aware that a failure to comply fully with the terms of this request may subject it to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

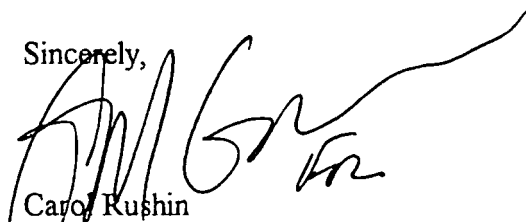
This letter in no way affects the obligations of Public Service Company of Colorado to comply with other local, State and Federal laws and regulations. In addition, nothing in this letter shall be construed to be a waiver by EPA of any rights or remedies under the Clean Air Act.

Public Service Company of Colorado may assert a claim of business confidentiality regarding any portion of the information submitted in response to this request (except for emission data). (See 40 CFR 2.201 *et seq.*) Failure to assert such a claim will render all submitted information available to the public without further notice. If you believe the disclosure of specific information would reveal a trade secret, clearly identify such information.

The requirements of this letter are not subject to the Paperwork Reduction Act of 1980, 44 U.S.C. §3501 *et seq.*

If you have any questions, please contact Albion Carlson of my staff concerning this matter at 303-312-7076.

Sincerely,



Carol Rushin
Assistant Regional Administrator,
Office of Enforcement, Compliance, &
Environmental Justice

Enclosures: 1) Instructions and Definitions
2) Statement of Certification
3) Data Charts for Big Stone Power Plant

cc: Margie Perkins, Director
Air Pollution Control Division
Colorado Department of Public Health and Environment

William Woodard
Public Service Company of Colorado Pawnee Station



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ENCLOSURE 1



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INSTRUCTIONS

- 1) Provide a separate narrative response to each question and subpart of a question set forth in the Information Request.
- 2) Precede each answer with the number of the question to which it corresponds and at the end of each answer identify the person(s) that provided information that was used or considered in responding to that question, as well as each person that was consulted in the preparation of that response.
- 3) Indicate on each document produced in response to this Information Request, or in some other reasonable manner, the number of the question to which it corresponds.
- 4) When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
- 5) Where documents or information necessary for a response are neither in your possession nor available to you, indicate in your response why such documents or information is not available or in your possession and identify any source that either possesses or is likely to possess such information.

DEFINITIONS

All terms used in this Request for Information will have their ordinary meaning unless such terms are defined in the Act, 42 U.S.C. § 7401, C.F.R. Part 52 (which incorporates the federally-approved Stated Implementation Plan), or other Clean Air Act implementing regulations. Reference is made to the EPA regulatory provisions only; however, you should apply the applicable federally-approved state provisions when appropriate. Definitional clarification is specified below.

- 1) The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any document.



- 2) The term "Capital Appropriation Requests" shall mean the documents used by station personnel that serve the purpose of describing capital projects for equipment and process changes when seeking management approval for a planned expenditure at the station. These documents are also known as capital improvement requests, authorizations for expenditure, work order records, or other similar names.
- 3) The term "Steam Generating Unit" shall have the same meaning as defined at 40 C.F.R. 60.41(b)
- 4) The term "Coal-Fired Boiler Unit" shall mean all equipment used for the purpose of generating electricity including but not limited to coal handling facilities, boilers, ductwork, stacks, turbines, generators, and all ancillary equipment.
- 5) The term "PSD/NSR" shall mean the Prevention of Significant Deterioration and the New Source Review preconstruction permitting programs established at 40 C.F.R. 51 and 52 and any respective program established under a state implementation plan.
- 6) The term "NSPS" shall mean the Standards of Performance for New Stationary Sources promulgated at 40 C.F.R. Part 60.
- 7) The term "MWHR" shall mean megawatt hours of electrical energy.
- 8) The term "KWHR" shall mean kilowatt hours of electrical energy.
- 9) The term "BTU" shall mean the British Thermal Unit of heat.



ENCLOSURE 2



STATEMENT OF CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all Enclosures and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment.

(Signature)

(Title)

(Date)



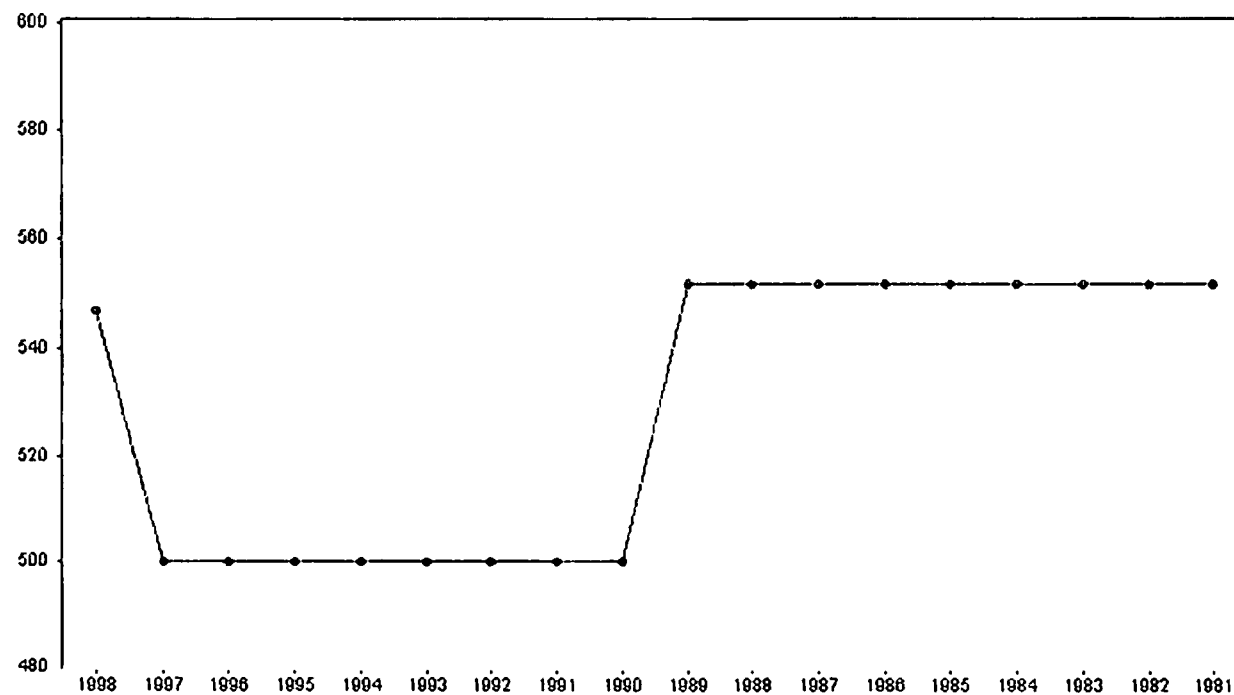
ENCLOSURE 3



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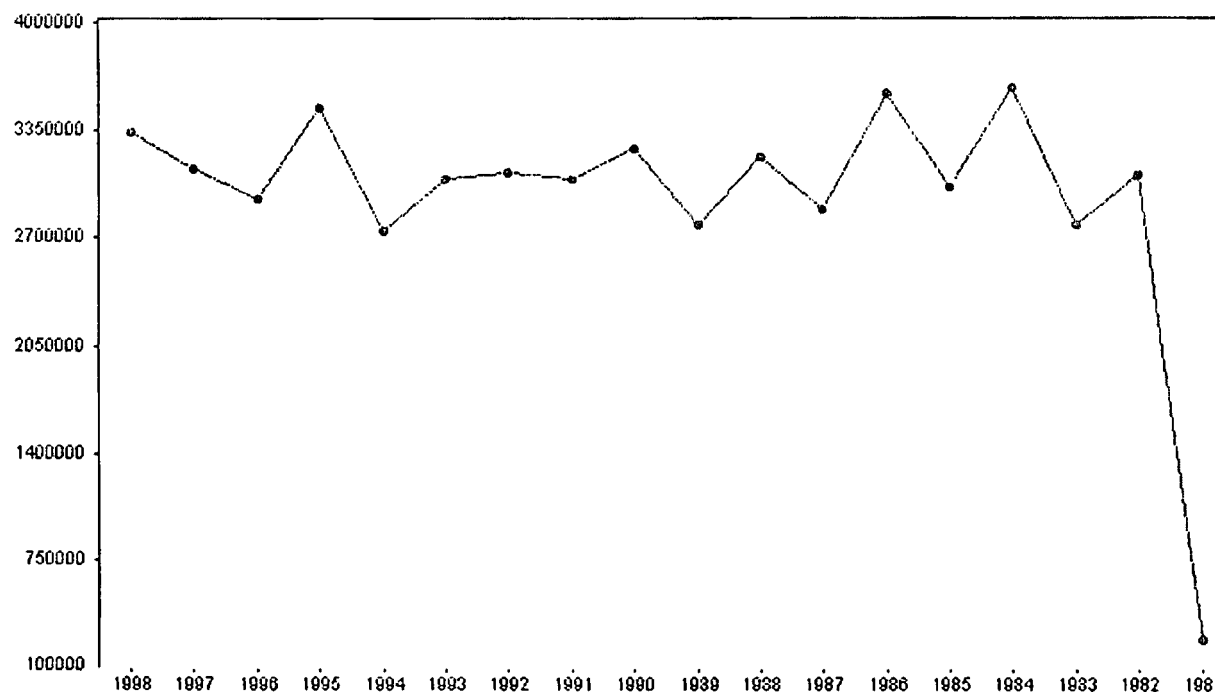
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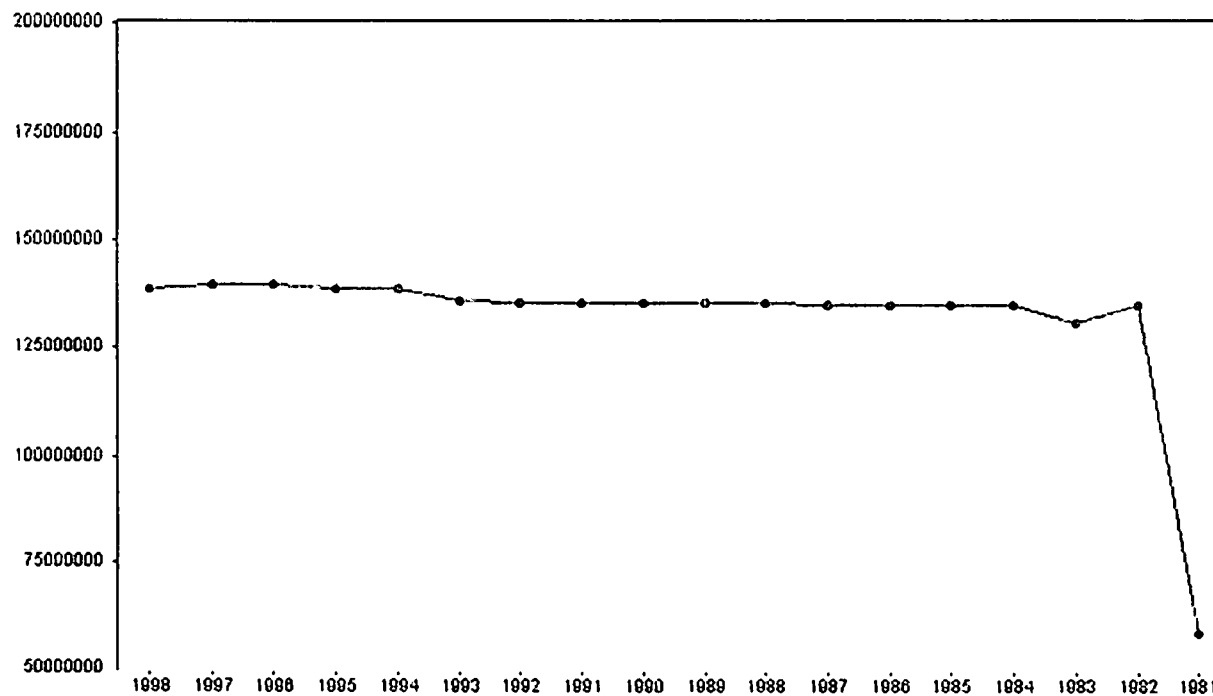
PAWNEE (ST)




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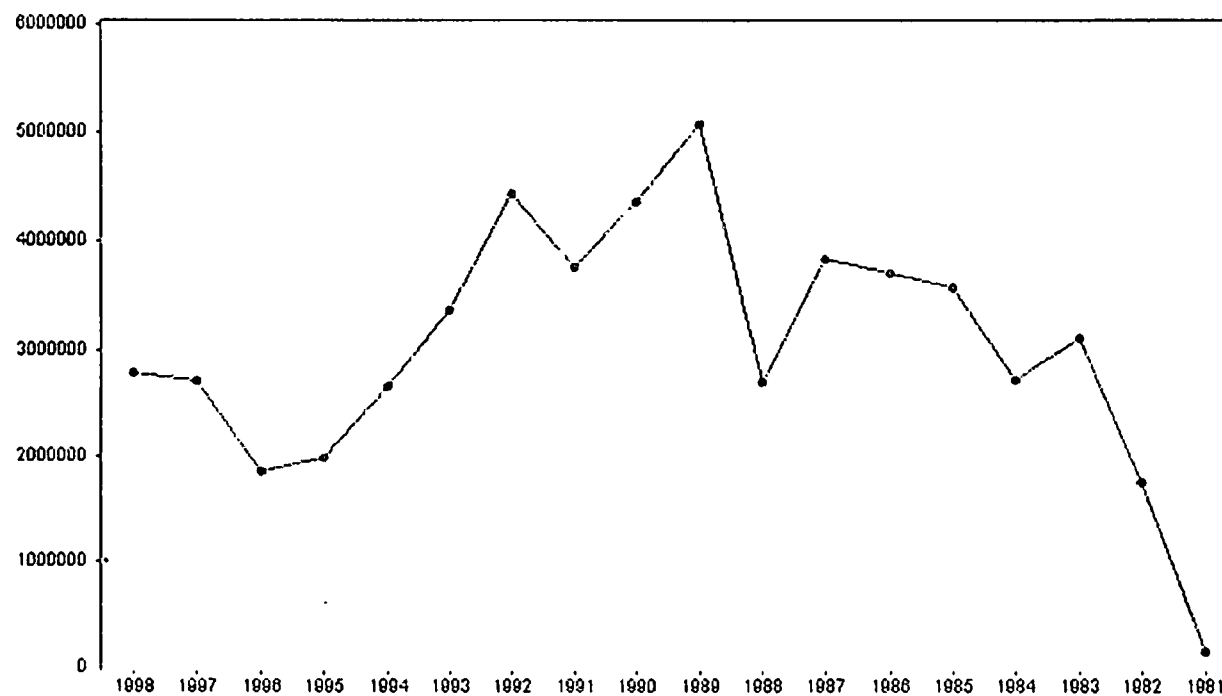
PAWNEE (ST)




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PAWNEE (ST)



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37) (tons)

PAWNEE (ST)